

# **Macomb Airways Inc.**

## **Ray Community Airport**

59819 Indian Tr.  
Ray, Mi 48096

April 9, 2004

Docket Management System  
U. S. Department of Transportation  
Room Plaza 401, 400 Seventh Street S.W.  
Washington, DC 20590-0001

Re: Number FAA-2003-16705/Airspace Docket No. 03-AGL-20  
Modification of Class D Airspace, Selfridge ANGB, MI.

Dear Rulemakers:

This letter is in OPPOSITION to the proposed rulemaking as the expansion of the airspace at MTS will have a significantly negative impact on operations Ray Community Airport (57D) as well as other nearby airports and we consider the expanded airspace as not needed nor useful.

Macomb Airways Inc. owns and operates Ray Community Airport as a public use airport. Ray Community Airport is an active general aviation airport serving the general and sport aviation communities. We cater to flight instruction and all types of general aviation activity. Most of our operations are VFR and amount to more than 8000 operations per year. This facility has 64 based aircraft most of which are Single Engine Land. This facility has been funded by State of Michigan money and is planned to operate into the foreseeable future in this general format. Operations are often to airports to the east of us such as Harsens Island, Marine City, Put in Bay and sight seeing operations over Lake St. Clair.

We have several points of opposition to this rule enumerated below:

1. The predominant Traffic Pattern at Ray Community airport is a left pattern to Runway 27 due to typical prevailing winds. We agree with the comments of document FAA=2003-16075-4 Conciatu, who cites the expansion of the Class D Airspace to within 2 miles of Ray Community Airport will impact arrival procedures to runways 18 and 27 by not allowing adequate spacing to enter the traffic pattern at a 45 degree angle sufficiently far enough out to observe and blend in with the traffic already in the pattern. There are often instances of elongate patterns when the pattern is crowded with several aircraft.
2. For departures on Runway 18, the expansion of the airspace will significantly impact the turns to crosswind and downwind and increase the risk of inappropriate decision process in making these turns due to the proximity of the airspace and the consequences of incursion adding to pilot workload.
3. The VFR operations at Ray Community airport will be pushed to the north and west of the airport unbalancing the distribution of operations in the airspace.
4. For the communities underlying the airspace, the noise and annoyance associated with low flying aircraft provide a precedent for the public to generalize an anti-airport sentiment that is detrimental to the future of all urban and sub-urban airports.
5. Seaplanes and sight seeing aircraft operations use the waters and overlying airspace to the north and east of MTC. These operations would be negatively impacted by this expansion.
6. The VFR aviation community is essential to the sustained operation of this airport and this expansion of the airspace will serve to reduce this form of traffic at this public use airport.

Based upon our research of the available information and comments, we can see no positive benefits of this rule that can justify the rule with so many negative aspects of it. Therefore we ask that you please REJECT this proposed rulemaking as unnecessary and detrimental to the safety of general aviation operations in this region.

Sincerely:  
Glen C. Grenier  
Chairman of the Board, Macomb Airways Inc.